

AUSA Stephanie Smith-Burris

United States District Court **FILED****Western****Texas****March 17, 2025**CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

District of _____

BY: _____ **MC**

DEPUTY

UNITED STATES OF AMERICA**CRIMINAL COMPLAINT****V.****Hugo MORENO-Mendez****CASE NUMBER: W25-74M**

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 13, 2025, in the Western District of Texas, defendant Hugo MORENO-Mendez, an alien, was found in the United States in Waco, McLennan County, Texas. The defendant unlawfully entered the United States and is an alien required to apply for registration and to be fingerprinted in the United States, did willfully fail, or refuse to make such application or to be fingerprinted, in violation of Title 8 United States Code, Section 1306(a), and refusal to cooperate with DNA collection, in violation of Title 34 United States Code, Section 40702. I further state that I am a Deportation Officer with U.S. Immigration and Customs Enforcement (ICE), and that this complaint is based on the following facts:

On or about March 13, 2025, defendant Hugo MORENO-Mendez, an alien, was found in Waco, Texas, within the Western District of Texas during a targeted enforcement action after he reported to the McLennan County Probation Department. A check of immigration databases for any lawful admission into the United States yielded negative results. Defendant MORENO entered the United States unlawfully sometime in 2004 and willfully failed or refused to make such application or to be fingerprinted after thirty days.

On or about March 13, 2025, defendant MORENO was transported to the ICE Waco office for administrative processing. Deportation Officers Navarro, Turner and Compean each made separate attempts to collect his fingerprints and DNA. MORENO refused to cooperate with each attempt.

Defendant MORENO's willful failure to apply for registration and to be fingerprinted is in violation of Title 8 United States Code, Section 1306(a), and refusal to cooperate with DNA collection is in violation of Title 34 United States Code, Section 40702(a)(5)(A).

Continued on the attached sheet and made a part hereof: ☐ Yes ☒ No

David Trowbridge
Deportation Officer

Signature of Complainant



Sworn to before me and subscribed in my presence,

March 17, 2025

Date

Derek T. Gilliland
U.S. Magistrate Judge

Name & Title of Judicial Officer

Waco, Texas

at

City and State



Signature of Judicial Officer